

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Sherri Norris) Case No. 15-30393
)
Debtor(s)) CHAPTER 13
)
) Judge Jacqueline P. Cox

NOTICE OF MOTION

TO:

Tom Vaughn (via electronic notice)

United States Trustee (via electronic notice)

Sherri Norris, P.O. Box 6612, , Broadview, IL 60155

See attached list of all creditors

PLEASE TAKE NOTICE that on December 4, 2017 at 9:00 AM or soon thereafter I shall be heard, I shall appear before the Honorable Judge Jacqueline P. Cox at 219 S. Dearborn St., Courtroom 680, Chicago, IL, and request that the attached motion be granted, at which time you may appear if so desired.

/s/ Adam B. Bourdette
Adam B. Bourdette
Ledford, Wu & Borges, LLC.
105 W. Madison St., 23rd Floor
Chicago, IL 60602
312-853-0200

PROOF OF SERVICE

I, the undersigned, certify that I caused this Notice and a copy of the attached document(s) to be served upon the entities named above by depositing the same in the U.S. Postal Service's mail box at 150 W. Madison St., Chicago, IL 60602, on November 9, 2017 before 3:00 p.m., except that the trustee, U.S. Trustee and any other party indicated in the Notice of Filing were served electronically by the court on such date.

/s/ Adam B. Bourdette
Adam B. Bourdette

Label Matrix for local noticing

0752-1

Case 15-30393

Northern District of Illinois

Chicago

Sun Sep 25 11:51:47 CDT 2016

U.S. Bankruptcy Court

Eastern Division

219 S Dearborn

7th Floor

Chicago, IL 60604-1702

CITY OF CHICAGO - DEPT OF FINANCE

C/O TALAN & KTSANES

223 W JACKSON - SUITE 512

CHICAGO IL 60606-6904

Cda/pontiac
Attn:Bankruptcy
Po Box 213
Streator, IL 61364-0213City of Chicago
121 N. LaSalle St
Chicago, IL 60602-1202Cook County Assessor's Office
118 N Clark
Chicago, IL 60602-1309Debt Recovery Solution
Attention: Bankruptcy
900 Merchants Concourse Ste L111
Westbury, NY 11590-5121Enhanced Acq
3840 E Robinson Rd
Amherst, NY 14228-2001GECRB/Care Credit
Attn: bankruptcy
Po Box 103104
Roswell, GA 30076-9104Greentree
Po Box 460700
Escondido, CA 92046-0700

Ditech Financial LLC Document Page 2 of 7

1400 Turbine Drive
Ste 200
Rapid City, SD 57703-4719Acceptance Now
5501 Headquarters Dr
Plano, TX 75024-5837Cavalry Investments, LLC
assignee of Ford Credit US
500 Summit Lake Drive, Ste 400
Valhalla, NY 10595-1340City Of Chicago Department Revenue
c/o Arnold Scott Harris P.C.
111 W Jackson Blvd Ste 600
Chicago, IL 60604-3517City of Chicago-Department of Finance
C/O Roberts and Weddle, LLC
309 W. Washington St. Suite 500
Chicago, IL 60606-3200Cook County Treasurer
118 North Clark Street
Suite 112
Chicago, IL 60602-1590Ditech Financial LLC
7340 S. Kyrene Rd
Recovery Dept T120
Tempe, AZ 85283-4573Fed Loan Serv
Po Box 60610
Harrisburg, PA 17106-0610GM Financial
Po Box 181145
Arlington, TX 76096-1145Gregory Crawford
144 S. 11th Ave.
Maywood, IL 60153-1336PERITUS PORTFOLIO SERVICES II, LLC
PO BOX 141419
Irving, Tx 75014-1419Americredit Financial Services INC. dba GM F
PO BOX 183853
Arlington, Texas 76096-3853Ccrservices
P O Box 32299
Columbus, OH 43232-0299City of Chicago
121 N. LaSalle St
107A
Chicago, IL 60602-1232Commonwealth Edison Company
3 Lincoln Center
Attn: Bankruptcy Department
Oakbrook Terrace, IL 60181-4204Cook County Treasurers Office
118 North Clark Street
Room 112
Chicago, IL 60602-1590Ditech Financial LLC
PO BOX 6154
Rapid City, SD 57709-6154
Telephone 57709-6154Fingerhut
6250 Ridgewood Road
Saint Cloud, MN 56303-0820Green Tree Servicing L
Po Box 6172
Rapid City, SD 57709-6172IL Dept of Employment Security
33 South State St.
9th Fl
Chicago, IL 60603-2806

Keynote Consulting
220 West Campus Drive
Suite 102
Arlington Heights, IL 60004-1498

Lakisha Rucker
3621 W. Polk, Apt. 306
Chicago, IL 60624-4442

Law Offices of Talan & Ktsanes
223 W. Jackson Blvd
Ste 512
Chicago, IL 60606-6904

Lekisha Rucker
PO Box 437093
Chicago, IL 60643-7093

Lvnv Funding
Po Box 10497
Greenville, SC 29603-0497

Mcsi Inc
Po Box 327
Palos Heights, IL 60463-0327

Med Business Bureau
Po Box 1219
Park Ridge, IL 60068-7219

Ntl Acct Srv
1246 University Av
Saint Paul, MN 55104-4125

Pinnacle Credit Service
Attn: Bankruptcy
Po Box 640
Hopkins, MN 55343-0640

Porania LLC
c/o Biltmore Asset Management
24500 Center Ridge Rd Ste 472
Westlake, OH 44145-5605

Quantum3 Group LLC as agent for
Sadino Funding LLC
PO Box 788
Kirkland, WA 98083-0788

RCN Cable
PO Box 11816
Newark, NJ 07101-8116

Rjm Acq Llc
575 Underhill Blvd Suite 224
Syosset, NY 11791-3416

Roberts & Weddle, LLC
309 W. Washington
Suite 500
Chicago, IL 60606-3200

Santander Consumer Usa
Po Box 961245
Ft Worth, TX 76161-0244

Sentry Credit
2809 Grand Ave
Everett, WA 98201-3417

South Commons Condo Association
2901 S. Michigan
Chicago, IL 60616-5217

Stellar Rec
4500 Salisbury Rd Ste 10
Jacksonville, FL 32216-0959

T.H.E. Management, Inc.
2130 Belmont
Chicago, IL 60618-6990

TALAN & KTSANES
223 W JACKSON - SUITE 512
CHICAGO IL 60606-6904

Tsi/980
600 Holiday Dr
Matteson, IL 60443-2241

U.S. Department of Education
C/O FedLoan Servicing
P.O. Box 69184
Harrisburg, PA 17106-9184

Jason P Allain
Ledford Wu and Borges, LLC
105 W. Madison
23rd Floor
Chicago, IL 60602-4647

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

Sherri Norris
3001 S. Michigan
Chicago, IL 60616-3261

Tom Vaughn
55 E. Monroe Street, Suite 3850
Chicago, IL 60603-5764

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STAPLES

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(u) Lekisha Rucker

(u) CONDO ASSOCIATION??

(p) DOCUMENT SERVING

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Irving, Tx 75014-1419

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MOTION TO MODIFY CONFIRMED PLAN

The debtor(s), by and through counsel, and in support of her Motion to Modify Confirmed Plan pursuant to 11 U.S.C. § 1329, states to the court as follows:

1. The court has jurisdiction over this matter under 28 U.S.C. §§ 1334 and 157.
2. This is a core proceeding pursuant to 28 U.S.C. § 157(b).
3. The debtor filed a petition for relief and a plan under Chapter 13 of the Bankruptcy Code on September 4, 2015
 4. The plan was confirmed by this court on January 13, 2016
 5. The debtor lost employment and is currently receiving unemployment benefits.
 6. The debtor has the ability to still make payments at a reduced rate.
 7. It is feasible to defer the plan arrears to:
 - a. the end of the plan
 - b. pay the general unsecured creditors at a 50% distribution
 - c. Lower the plan payments to \$1,600.00
 - d. Adjust the plan base to \$ 91,415.85

WHEREFORE, the debtor requests that the court defer all Trustee arrears accumulated to date) to ensure that allowed general unsecured creditors still receive a 50% distribution, lower the plan payments to \$1,600.00, adjust the plan base to \$ 91,415.85 and grant the debtor such other relief as just and proper.

Respectfully submitted,

/s/ Adam B. Bourdette
Adam B. Bourdette
Ledford, Wu & Borges, LLC.
105 W. Madison St., 23rd Floor
Chicago, IL 60602
312-853-0200

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ORDER MODIFYING CONFIRMED PLAN

This cause coming on the debtor's Motion to Modify Confirmed Plan, all parties having been given notice thereof, and the court being duly advised, IT IS ORDERED BY THE COURT that the confirmed plan is hereby modified to:

- a. defer the plan arrears to the end of the plan
- b. pay the general unsecured creditors at 50%
- c. Modify the plan payments to \$1600.00
- d. Adjust the plan base to \$ 91,415.85

Dated:

UNITED STATES BANKRUPTCY JUDGE

Prepared by:

Adam B. Bourdette
Ledford, Wu & Borges, LLC.
105 W. Madison St., 23rd Floor
Chicago, IL 60602
312-853-0200